To: Blumenfeld, Jared[BLUMENFELD.JARED@EPA.GOV]

From: Aaron Greenspan

Sent: Thur 6/27/2013 6:28:43 AM

Subject: Fwd: COE/PA - 601 CA: Followup Response - Local Concerned Resident

MAIL_RECEIVED: Thur 6/27/2013 6:28:55 AM

Mr. Blumenfeld,

Please see the message below. Due to my mistyping your e-mail address, it bounced the first time I tried to send it to you.

Aaron

Begin forwarded message:

From: Aaron Greenspan <aarong@thinkcomputer.com>

Subject: Re: COE/PA - 601 CA: Followup Response - Local Concerned

Resident

Date: June 26, 2013 11:25:36 PM PDT

To: Roger Papler < roger.papler@waterboards.ca.gov >, Matt Salazar

<salazar.matt@epa.gov>

Cc: John Gabaix <<u>gabaix@gmail.com</u>>, Fred Balin <<u>fbalin@gmail.com</u>>, John Wolfenden <<u>john.wolfenden@waterboards.ca.gov</u>>, Jared Blumenfeld

<jared.blumenfeld@epa.gov>, Jason.Nortz@CityofPaloAlto.org, Sue Dremann

<sdremann@paweekly.com>

Roger and Matt,

Since I am trying to decide if and when to move, I am once again looking at data on the TCE problem near my present home in Palo Alto and I have additional concerns that have not been addressed.

In the past, among other questions and requests, I asked for the CA Water Boards or EPA to pay for in-home air and water testing throughout College Terrace. Matt Salazar (EPA) insisted that there was no reasonable cause for testing. I disagreed.

As you are probably aware, Google, Inc. recently had to inform over 1,000 employees working at a building complex near the Whisman Station area of Mountain View that they had been exposed to TCE through the indoor air. See

http://www.sfgate.com/business/article/Google-workers-at-Superfund-site-exposed-4368421.php. Google's buildings are located at 369, 379, 389 and 399 North Whisman Road and 468 Ellis Street in Mountain View. The specific problems in these buildings have been heavily documented

at https://s3.amazonaws.com/s3.documentcloud.org/documents/612000/369-399-n-whisman-ia-report-22february13-final.pdf in a 1,303-page report prepared by Geosyntec Consultants.

No monitoring wells appear on GeoTracker at this specific environmental site, with the Water Boards code SL0608508417

(http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL0608508417). It would appear that there is therefore no data to suggest that any TCE could be found at the Google buildings at all. So I looked for the closest monitoring wells, which are tied to a different site, SL18209589 (coincidentally, also an HP site). These wells show relatively high levels of TCE in groundwater, up to $260\mu g/L$ at a single well (Monitoring Well W26) in 2012--but not nearly as high as the 2012 readings of 1,000 $\mu g/L$ (Monitoring Well V8-7) or 1,200 $\mu g/L$ (Monitoring Well F98A) at 601 California Avenue, or 3,500 $\mu g/L$ (Monitoring Well O119A1) at 640 Page Mill Road in Palo Alto. (For a convenient heat map visualization I built based upon CA Water Boards data, see http://www.plainsite.org/environment/.)

The monitoring wells in Mountain View are 0.5 miles away from the Google buildings where employees were exposed, according to Google Earth. As is also the case in Palo Alto, the corporation responsible for preparing the Mountain View HP site's "Annual Groundwater Self-Monitoring Report 2012" is Stantec Consulting Services, Inc. This report is available

at http://geotracker.waterboards.ca.gov/esi/uploads/geo_report/4338989198/SL18209589.PDF.

In my opinion, this Stantec report has two notable attributes. The first is page 50 of the PDF, which demonstrates that the groundwater elevation contour is much deeper at the Mountain View site (~50 feet) when compared to the Palo Alto site (~15 feet). Therefore, it would appear that contaminants in the groundwater in Palo Alto are vertically much closer to the surface than in Mountain View. The second notable attribute is on page 51, where the TCE contour map begins and ends on the left and right sides with two question marks per side, depicted as "?" at the end of each line. Those question marks suggest unknown boundaries to the (roughly) north and south of that plume, but the map gives no indication whatsoever that the TCE plume extends to the west.

369, 379, 389 and 399 North Whisman Road and 468 Ellis Street--where harmful levels of TCE were detected in the indoor air--are all to the west.

I don't really see how it's possible to trust Stantec's reporting at all given this set of circumstances. When the same company is used year after year, there are no checks on previous work. Similar boundary question marks also appear in Stantec's Palo Alto reports. One could argue that they are simply incompetent, or one could argue that they are doing their job and the Water Boards' apparent system of breaking large, aggregated contaminant plumes up into many tiny "sites" means that outside reporting consultants are relieved of the burden of analyzing anything arguably outside of their narrow scope. The affected Google offices, as I previously stated, were 0.5 miles (2,640 feet) away from monitoring wells showing about 20% of the concentration of TCE we know to be here in Palo Alto, deeper in the ground. My home is about 0.18 miles (940 feet) away from monitoring wells showing 5x the concentration of TCE we know to be in Mountain View, closer to the surface. Your and EPA's argument that no data exists to suggest a cause for concern is therefore false. Data does exist that should give rise to concern and you and EPA either were or should have been well aware of it.

In addition, I noticed the cookie dough odor yet again, quite strongly this time, outside of Wells Fargo yesterday when I went to make a bank deposit. It remains unexplained.

Lastly, I would like to know if the residents of Peter Coutts Circle, right next to College Terrace, have been informed that monitoring wells from the 1501 Page Mill Road site indicate that many of their homes are directly on top of that TCE plume (also according to a Stantec report, which probably means that many more homes are actually affected; see http://geotracker.waterboards.ca.gov/esi/uploads/geo_report/9338317811/SL720501209.PDF page 51). Many of the wells included in these reports are not even checked, potentially introducing errors in the contour diagrams.

You have already admitted in your June 6, 2013 letter to Varian Medical Systems that you, "inadvertently overlooked the need to better define the northwest boundary of the COE plume near the subject property," where there are no monitoring wells at all--not to mention that the boundary is arbitrary in the first place. Please explain again why indoor air testing and water testing for residents of College Terrace and Stanford's Escondido Village, not to mention residents of Barron Park, Peter Coutts Circle, and any resident or business within 0.5 miles of the COE plume and/or 1501 Page Mill Road plume, is unwarranted.

Is ignoring the problem repeatedly, or pretending to solve it with a single monitoring well installation, the "more aggressive approach to ensure prompt action" that the EPA was referring to when it had to explain how 1,000 people had been exposed to TCE in March?

Aaron